

Philip Lo (SBN: 12253)  
 GORDON REES SCULLY MANSUKHANI, LLP  
 300 S. 4<sup>th</sup> Street, Suite 1550  
 Las Vegas, NV 89101  
 Telephone: (702) 577-9300  
 Facsimile: (702) 255-2858  
 E-Mail: plo@grsm.com

*Attorneys For Defendant Portfolio Recovery Associates, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JESSICA SCHEDENECK,	)	CASE NO. 2:22-cv-01348-GMN-NJK
	)	
Plaintiff,	)	<b>STIPULATION TO EXTEND</b>
	)	<b>TIME TO FILE RESPONSE TO</b>
vs.	)	<b>COMPLAINT</b>
	)	
PORTFOLIO RECOVERY ASSOCIATES, LLC	)	<b>(Second Request)</b>
	)	
Defendant.	)	
	)	

Pursuant to Local Rule IA 6-1, Defendant Portfolio Recovery Associates, LLC (“PRA”) by and through its attorney, Philip Lo of Gordon Rees Scully Mansukhani, LLP and Plaintiff Jessica Schedeneck, by and through her attorney Michael Kind of Kind Law, hereby stipulate and agree as follows:

1. Plaintiff filed her Complaint on August 18, 2022.
2. PRA was served with the summons and Complaint on August 22, 2022.
3. As such, PRA’s responsive pleading deadline was due on September 12, 2022.
4. PRA submitted its first extension request on September 19, 2022.
5. The Court granted PRA’s first extension request on September 20, 2022, extending PRA’s responsive pleading deadline to October 19, 2022. During this time, the parties have discussed the allegations and claims at issue.

1           6.     On October 13, 2022, upon PRA's counsel's request, Plaintiff provided a  
2     settlement demand. PRA's counsel has communicated this demand to its client, seeking a  
3     response. PRA's client contact is out of office from October 17 to 21, 2022.

4           7.     The parties are optimistic that settlement discussions will lead to full resolution of  
5     this matter.

6           8.     Accordingly, PRA requests a 14-day extension to file its response to the  
7     Complaint, to November 2, 2022.

8           9.     PRA's counsel has communicated with Plaintiff's counsel, and Plaintiff consents  
9     to the requested extension.

10          10.    This is PRA's second extension request. Good cause exists, as the parties seek this  
11    extension to allow for exploration of early resolution without incurring unnecessary fees and  
12    costs.

13          11.    This stipulation is made in good faith and is not intended to inflict unnecessary  
14    delay.

15          12.    Pursuant to this Court's local rules, a proposed Order has been attached hereto as  
16    Exhibit A.

17               IT IS SO STIPULATED.

18               DATED October 18, 2022.

19                               GORDON REES SCULLY MANSUKHANI,  
20                               LLP

21  
22                               By: /s/ Philip Lo  
                                     Philip Lo  
                                     Attorneys for Defendant  
                                     Portfolio Recovery Associates, LLC

23  
24                               KIND LAW

25  
26               IT IS SO ORDERED.  
27               Dated: October 20, 2022

28  
                                       
\_\_\_\_\_  
Nancy J. Koppe  
United States Magistrate Judge

                                     By: /s/ Michael Kind (with permission)  
                                     Michael Kind  
                                     Attorneys for Plaintiff